

EPA Jacket 71368-61

Vol.1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 8, 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-362867
EPA File Symbol or Registration Number: 71368-AR
Product Name: IMIDACLOPRID TECHNICAL
EPA Receipt Date: 07-Dec-2005
EPA Company Number: 71368
Company Name: NUFARM, INC.

George Meindl
NUFARM, INC.
1333 BURR RIDGE PARKWAY, SUITE 125A
BURR RIDGE, IL 60527

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R31

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ 4,200 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division



Nufarm Americas, Inc.
George Meindl
Registration Manager
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755-7277 Fax: 708.754.0314
george.meindl@us.nufarm.com

December 5, 2005

Via Overnight Courier

Document Processing Desk (RegFee)
Office of Pesticide Programs
US Environmental Protection Agency
1801 South Bell Street
Arlington, VA 22202-4501

Subject: Application for a New Product Registration
Imidacloprid Technical
EPA Reg. No. 71368-

Nufarm Inc. (EPA Company Number 71368) submits the enclosed registration application and supporting documents.

Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient Imidacloprid) using a "cite-all" method.

Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

Let me know if you have any questions or concerns. Thank you.

Regards,

A handwritten signature in black ink, appearing to read "George Meindl", written in a cursive style.

George Meindl
Registration Manager
Nufarm Americas, Inc.



Nufarm Americas, Inc.
George Meindl
Registration Manager
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755-7277 Fax: 708.754.0314
george.meindl@us.nufarm.com

December 5, 2005

Via Overnight Courier

Dan Kenny (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U. S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 Bell Street
Arlington, VA 22202-4501

Subject: Imidacloprid Technical
EPA Reg. No. 71368-
Application for New Product Registration
Non - Fast track request (R31)

Dear Mr. Kenny:

Nufarm Inc. is interested in registering the subject product. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R31 86, new product non-fast track. We believe this is the appropriate category since this application is for a new source of an existing technical (active ingredient Imidacloprid) using a "cite-all" method. Therefore, Nufarm anticipates this action requires a fee of \$ 4,200 with a six -month review time at the Agency.

To process this request please find attached the transmittal document listing the administrative material and all submitted studies needed to support this registration request. In addition, within the next 2 weeks Nufarm will be submitting complete end use registration packages using this technical source.

If you should have any questions regarding this matter, feel free to contact me at 708.755.7277 or email at george.meindl@us.nufarm.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Meindl', written over a horizontal line.

George Meindl
Registration Manager
Nufarm Inc.



Nufarm Americas, Inc.
George Meindl
Registration Manager
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755-7277 Fax: 708.754.0314
george.meindl@us.nufarm.com

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Inc.
1333 Burr Ridge Parkway Suite 125A
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration
Imidacloprid Technical
EPA File Symbol 71368-
PRIA category R31 86
New Product/Non-fast track
New Source of an existing active ingredient using "Cite all" method

3. Date of this Submission

December 5, 2005

4. List of Submitted Studies

Volume 1
Administrative Documents

PRIA letter
Application for Pesticide Registration (EPA form 8570-1)
Confidential Statement of Formula (EPA form 8570-4)
Certification with Respect to Citation of Data (EPA form 8570-34)
Data Matrix (EPA form 8570-35) both public and EPA versions
Proposed draft labels (5 copies)

Volume 2
(3 copies of all studies)

Product Chemistry (Guidelines 830.1550 - 1670)
Product Chemistry (Guidelines 830.1750 - 1800)
Product Chemistry (Guidelines 830.1700)



Nufarm Americas, Inc.
George Meindl
Registration Manager
1333 Burr Ridge Parkway, Suite 125A
Burr Ridge, IL 60527
Phone: 708.755-7277 Fax: 708.754.0314
george.meindl@us.nufarm.com

Volume 3
(3 copies of all studies)

Color (Guideline 830.6302)
Physical state (Guideline 830.6303)
Odor (Guideline 830.6304)
Stability to normal and elevated temperature, metals and metal ions (Guideline 830.6313)
Oxidation/Reduction: chemical incompatibility (Guideline 830.6314)
pH (Guideline 830.7000)
UV/Visible Absorption (Guideline 830.7050)
Melting Point (Guideline 830.7200)
Density/Relative Density/Bulk Density (Guideline 830.7300)
Partition Coefficient (n-octanol/water), Shake Flask Method (Guideline 830.7550)
Water Solubility, Shake Flask Method (Guideline 830.7840)

Company Official: George Meindl

Signature: 

Company Name: Nufarm Inc.

Company Contact: George Meindl
Registration Manager

Phone: 708.755.7277



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0080



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 71368-AR	2. EPA Product Manager Dan Kenny	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Imidacloprid technical	PMS 1	
5. Name and Address of Applicant (Include ZIP Code) Nufarm Americas, Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge, IL 60527 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(II), my product is similar or identical in composition and labeling to: EPA Reg. No. 264-755 Product Name Imidacloprid Technical Insecticide	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed label in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

R31 New product registration request - non-fast track
\$4200.00
6 month review
Product is substantially similar to Bayer's Imidacloprid Technical Insecticide

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
				<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name George Meindl (george.meindl@us.nufarm.com)	Title Registration Manager	Telephone No. (Include Area Code) 708.555.7277
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Registration Manager	
4. Typed Name George Meindl	5. Date 12-5-2005	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date December 5, 2005

EPA Reg No./File Symbol 71368-

Page 1 of 4

Applicant's/Registrant's Name & Address

Nufarm Inc.
1333 Burr Ridge Parkway Suite 125A
Burr Ridge, IL 60527

Product

Imidacloprid Technical

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
830.1550	Product Identity and Composition	Volume 2	Nufarm Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 2	Nufarm Inc.	OWN	
830.1620	Description of Production Process	Volume 2	Nufarm Inc.	OWN	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	Volume 2	Nufarm Inc.	OWN	
830.1700	Preliminary Analysis	Volume 2	Nufarm Inc.	OWN	
830.1750	Certified Limits	Volume 2	Nufarm Inc.	OWN	
830.1800	Enforcement Analytical Method	Volume 2	Nufarm Inc.	OWN	
830.6302	Color	Volume 3	Nufarm Inc.	OWN	
830.6303	Physical State	Volume 3	Nufarm Inc.	OWN	
830.6304	Odor	Volume 3	Nufarm Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Volume 3	Nufarm Inc.	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 3	Nufarm Inc.	OWN	
830.6315	Flammability				Not required ²
830.6316	Explosibility				Not required ²

Signature

Name and Title

George Meindl, Registration Manager

Date

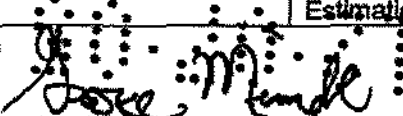
12/6/05

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DATA MATRIX

Date December 5, 2005			EPA Reg No./File Symbol 71368-		Page 2 of 4
Applicant's/Registrant's Name & Address Nufarm Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge, IL 60527			Product Imidacloprid Technical		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6317	Storage Stability				Not required ²
830.6319	Miscibility				Not required ²
830.6320	Corrosion Characteristics				Not required ²
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH	Volume 3	Nufarm Inc.	OWN	
830.7050	UV/Visible Absorption	Volume 3	Nufarm Inc.	OWN	
830.7100	Viscosity				Not required ²
830.7200	Melting Point/Melting Range	Volume 3	Nufarm Inc.	OWN	
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	Volume 3	Nufarm Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ²
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	Volume 3	Nufarm Inc.	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
Signature 			Name and Title George Meindi, Registration Manager		Date 12-6-05

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

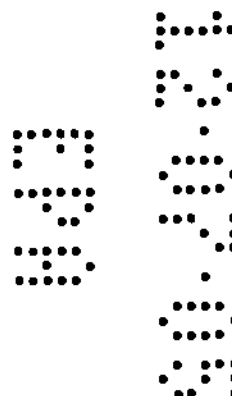
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DATA MATRIX

Date December 5, 2005		EPA Reg No./File Symbol 71368-		Page 4 of 4	
Applicant's/Registrant's Name & Address Nufarm Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge, IL 60527		Product Imidacloprid Technical			
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Imidacloprid Generic Data Requirements	Cite-All Method utilized by Nufarm Inc. for Imidacloprid data requirements		Spray Drift Task Force	OWN	
Imidacloprid Generic Data Requirements	Cite-All Method utilized by Nufarm Inc. for Imidacloprid data requirements		Outdoor Residential Exposure Task Force	OWN	
Imidacloprid Generic Data Requirements	Cite-All Method utilized by Nufarm Inc. for Imidacloprid data requirements		Agricultural Reentry Task Force	OWN	
Imidacloprid Generic Data Requirements	Cite-All Method utilized by Nufarm Inc. for Imidacloprid data requirements		Agricultural Handler Exposure Task Force	OWN	
Signature <i>George Meindl</i>			Name and Title George Meindl, Registration Manager		Date 12-6-05

Endnotes for Data Matrix for Imidacloprid Technical

- ¹ 830.1650 – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient. See 830.1620 for production process information.
- ² 830.6314, 830.6315, 830.6316, 830.6317, 830.6319, 830.6320, 830.6321, 830.7100, 830.7370 – Per OPPTS 830.1000, these data are not required for the registration of a technical grade active ingredient.
- ³ 830.7220, 830.7950 – Per OPPTS 830.1000, these data are not required for the registration of Imidacloprid Technical because this product is a solid. Please refer to OPPTS 830.7200.




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Date December 5, 2005		EPA Reg No./File Symbol 71368-		Page 4 of 4	
Applicant's/Registrant's Name & Address Nufarm Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge, IL 60527		Product Imidacloprid Technical			
Ingredient imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements					
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
Signature 			Name and Title George Meindl, Registration Manager		Date 12.6-05

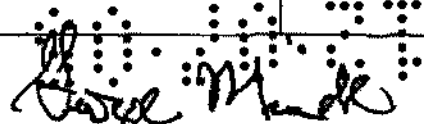
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DATA MATRIX

Date December 5, 2005		EPA Reg No./File Symbol 71368-		Page 2 of 4	
Applicant's/Registrant's Name & Address		Product			
Nufarm Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge, IL 60527		Imidacloprid Technical			
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
			Nufarm Inc.	OWN	
Signature 		Name and Title		Date	
		George Meindl, Registration Manager		12-6-05	

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

[illegible]

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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Date December 5, 2005

EPA Reg No./File Symbol 71368-

Page 1 of 4

Applicant's/Registrant's Name & Address

Nufarm Inc.
1333 Burr Ridge Parkway Suite 125A
Burr Ridge, IL 60527

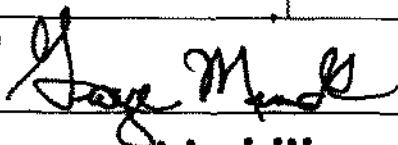
Product

Imidacloprid Technical

Ingredient Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force	OWN	
			Outdoor Residential Exposure Task Force	OWN	
			Agricultural Reentry Task Force	OWN	
			Agricultural Handler Exposure Task Force	OWN	

Signature

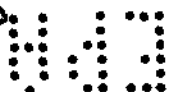


Name and Title

George Meindi, Registration Manager

Date

12-6-05






UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Nufarm Inc. 1333 Burr Ridge Parkway Suite 125A Burr Ridge IL 60527 708.755.7277	EPA Registration Number/File Symbol 71368-
Active Ingredient(s) and/or representative test compound(s) Imidacloprid	Date 12/5/2005
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) terrestrial food and nonfood crop, greenhouse food and nonfood crop, domestic outdoor and indoor	Product Name Imidacloprid Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

George Melndl

Date

12/5/2005

Typed or Printed Name and Title

George Melndl Registration Manager

XX

CHEMICAL 129099 CHEMICAL NAME
Imidacloprid

COMPANY# 000100 SYNGENTA CROP PROTECTION, INC.
* DATA TYPES * ATTN: REGULATORY AFFAIRS
EU AT EC FW EF OT PO BOX 18300
XX GREENSBORO, NC 27419

COMPANY# 000264 BAYER CROPSCIENCE LP
* DATA TYPES * 2 T.W. ALEXANDER DRIVE
BO AT EC FW EF OT RESEARCH TRIANGLE PARK, NC 27709
XX XX

COMPANY# 000432 BAYER ENVIRONMENTAL SCIENCE
* DATA TYPES * A BUSINESS GROUP OF BAYER CROPSCIENCE LP
EU AT EC FW EF OT 2 T. W. ALEXANDER DRIVE
XX XX RESEARCH TRIANGLE PARK, NC 27709

COMPANY# 003125 BAYER CORP
* DATA TYPES * PO BOX 4913
EU AT EC FW EF OT KANSAS CITY, MO 641200013
XX XX

COMPANY# 007501 GUSTAFSON LLC
* DATA TYPES * PO BOX 66065
EU AT EC FW EF OT DALLAS, TX 75266
XX XX

COMPANY# 010465 CHEMICAL SPECIALTIES INC
* DATA TYPES * ONE WOODLAWN GREEN SUITE 250
EU AT EC FW EF OT CHARLOTTE, NC 28217
XX XX

COMPANY# 011556 BAYER HEALTHCARE LLC
* DATA TYPES * ANIMAL HEALTH DIVISION
EU AT EC FW EF OT PO BOX 390
XX XX SHAWNEE MISSION, KS 66201

COMPANY# 033657 LANDIS INTERNATIONAL, INC.
* DATA TYPES * Agent for: MITSUI CHEMICALS AMERICA, INC
EU AT EC FW EF OT PO BOX 5126
XX XX VALDOSTA, GA 32603

COMPANY# 039967 LANXESS CORPORATION
* DATA TYPES * 211 RIDC PARK WEST DRIVE
EU AT EC FW EF OT PITTSBURGH, PA 15275
XX

COMPANY# 066607 SPRAY DRIFT TASK FORCE
* DATA TYPES * 1900 K STREET, NW
EU AT EC FW EF OT WASHINGTON, DC 20006
XX

COMPANY# 068467 MYCOGEN SEEDS
* DATA TYPES * C/O DOW AGROSCIENCES LLC
EU AT EC FW EF OT 9330 ZIONSVILLE ROAD
XX XX INDIANAPOLIS, IN 46268

COMPANY# 069217 REGWEST COMPANY, LLC
* DATA TYPES * Agent for: ARBOR SYSTEMS, LLC
EU AT EC FW EF OT 30856 ROCKY ROAD
XX GREELEY, CO 80631

COMPANY# 069332 ROGOSHESKE CONSULTING
* DATA TYPES * Agent for: PET LOGIC, L.L.C.
EU AT EC FW EF OT 1479 W POND RD
XX XX EAGAN, MN 55122

COMPANY# 071754 OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE, L.L.C.
* DATA TYPES * 1350 I STREET, N.W.
EU AT EC FW EF OT WASHINGTON, DC 20005

XX

COMPANY# 071755 AGRICULTURAL REENTRY TASK FORCE
* DATA TYPES * 1350 I STREET, N.W.
EU AT EC FW EF OT WASHINGTON, DC 20005
XX

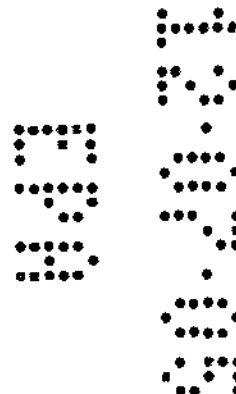
COMPANY# 072155 BAYER ADVANCED
* DATA TYPES * A BUSINESS UNIT OF BAYER CROPS SCIENCE LP
EU AT EC FW EF OT 2 T.W. ALEXANDER DRIVE
XX RESEARCH TRIANGLE PARK, NC 27709

COMPANY# 072616 REGULATORY SERVICES INC.
* DATA TYPES * Agent for: TARANAKI NUCHEM LTD.
EU AT EC FW EF OT 17220 WESTVIEW RD
XX XX XX LAKE OSWEGO, OR 97034

COMPANY# 074578 ARHDRJET
* DATA TYPES * C/O DELTA ANALYTICAL CORPORATION
EU AT EC FW EF DT 7910 WOODMONT AVENUE, SUITE 1000
XX BETHESDA, MD 20814

COMPANY# 075234 AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
* DATA TYPES * PO BOX 509
EU AT EC FW EF OT MACON, MO 63552
XX

COMPANY# 075506 ARCH TREATMENT TECHNOLOGIES, INC.
* DATA TYPES * 1955 LAKE PARK DRIVE
EU AT EC FW EF OT SMYRNA, GA 30080
XX



Imidacloprid Technical

ACTIVE INGREDIENT:

imidacloprid, 1-[[6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine . . . 98%

OTHER INGREDIENTS: 2%

TOTAL 100%

EPA Reg. No. 71368-

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED

Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice.

IF IN EYES

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products.

Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products for:

Terrestrial Non-food Crop, or Residential and Commercial Outdoor: Lawns, turfgrasses, ornamentals;

Terrestrial Food Crop: Apple, Banana, Barley, Blueberry, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy vegetables, Leafy Petiole vegetables, Legume vegetables, Hop, Pecan, Pome fruit, Potato, Prune garden beet, Roots and Tops, Root vegetables, edible seed crops for Sorghum, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tropical Fruit, Tuberous and Corm Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Nufarm Americas Inc.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

WARRANTY STATEMENT

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Prepared by GLM
(RV110105)

Imidacloprid Technical

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazoildinimine . . . 98%

OTHER INGREDIENTS: 2%

TOTAL 100%

EPA Reg. No. 71368-

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED

Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice.

IF IN EYES

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products.

Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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Terrestrial Non-food Crop, or Residential and Commercial Outdoor: Lawns, turfgrasses, ornamentals;

Terrestrial Food Crop: Apple, Banana, Barley, Blueberry, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy vegetables, Leafy Petiole vegetables, Legume vegetables, Hop, Pecan, Pome fruit, Potato, Prune garden beet, Roots and Tops, Root vegetables, edible seed crops for Sorghum, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tropical Fruit, Tuberous and Corm Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Nufarm Americas Inc.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

WARRANTY STATEMENT

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Prepared by GLM
(RV110105)

Imidacloprid Technical

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine . . . 98%

OTHER INGREDIENTS: 2%

TOTAL 100%

EPA Reg. No. 71368-

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED

Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15 to 20 minutes.

Call a poison control center or doctor for treatment advice.

IF IN EYES

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products.

Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

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Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

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Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

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For Medical Emergencies Only, Call (877) 325-1840

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Prepared by GLM
(RV110105)

Imidacloprid Technical

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine . . . 96%

OTHER INGREDIENTS: 2%

TOTAL 100%

EPA Reg. No. 71366-

EPA Est. No.

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID

IF SWALLOWED

Call a poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

IF INHALED

Move person to fresh air.

If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING

Take off contaminated clothing.

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IF IN EYES

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.

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HOT LINE NUMBER

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NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

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Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

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Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

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STORAGE AND DISPOSAL

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Prepared by GLM
(RV110f05)

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50.50